

HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
DISTRICT OF WASHINGTON
AT SEATTLE

SIXTY-01 ASSOCIATION OF APARTMENT
OWNERS, a Washington non-profit
corporation,

Plaintiff,

v.

PUBLIC SERVICE INSURANCE
COMPANY; et al.,

Defendants.

Case No. 2:22-cv-01373-JCC

STIPULATED MOTION AND
~~[PROPOSED]~~ ORDER TO EXTEND
DEADLINE FOR PERPETUATION
DEPOSITION

NOTE ON MOTION CALENDAR:

April 1, 2025

I. STIPULATION

The Court's December 23, 2024 Order (Dkt. # 251) extended the discovery deadline to February 28, 2025, solely for the purposes of perpetuating Mr. Dubyk's testimony, should he be unavailable at trial. The parties previously submitted a stipulated motion to extend the deadline for Mr. Dubyk's perpetuation deposition to April 1, 2025, which was granted by the Court (Dkt.# 289).

Mr. Dubyk's perpetuation deposition was scheduled for March 28, 2025. Prior to that date, Mr. Dubyk became unavailable to appear for the deposition and PSIC is uncertain when he will be

1 available. The parties have conferred and agreed to request a further extension of the deadline for
2 Mr. Dubyk's perpetuation deposition for an additional 60 days, or until June 2, 2025.

3 The parties now submit this stipulated motion to the Court seeking a new deadline of June
4 2, 2025 for any perpetuation deposition of Mr. Dubyk.

5 DATED this 1st day of April, 2025.

6 ASHBAUGH BEAL

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Attorneys for Defendant

17 **II. ORDER**

18 IT IS SO ORDERED.

19 DATED this 2nd day of April 2025.

20 

21 JUDGE JOHN C. COUGHENOUR
22 United States District Judge

Presented by:

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CERTIFICATE OF SERVICE

I, Will Cummins, hereby declare and state as follows:

I am a citizen of the United States and employed in Seattle, Washington; I am over the age of eighteen years and not a party to the within action; my business address is 1420 Fifth Avenue, Suite 2200, Seattle, Washington, 98101.

On the date set forth below, I caused to be served:

STIPULATED MOTION AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR PERPETUATION DEPOSITION

in the within matter by arranging for a copy to be delivered on the interested parties in said action, in the manner described below, addressed as follows:

| | |
|--|--|
| Kristen B. Moran, WSBA # 59328 Jesse D. Miller, WSBA #35837 Zachary O. McIsaac, WSBA #35833 Ashbaugh Beal 920 Fifth Avenue Suite 3400 Seattle, WA 98104 kmoran@ashbaughbeal.com jmiller@ashbaughbeal.com zmcisaac@ashbaughbeal.com tmacDonald@ashbaughbeal.com Attorneys for Plaintiff | <input checked="" type="checkbox"/> by ECF Court efilng Application to the the extent counsel is registered <input checked="" type="checkbox"/> by Electronic Mail: <input type="checkbox"/> by Facsimile Transmission <input type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery |
| Michael S. Wampold, WSBA #26052 Tomis A. Gahan, WSBA #32779 PWRFL 1001 4 th Avenue, Suite 4131 Seattle, WA 98154 wampold@pwrfl-law.com gahan@pwrfl-law.com kelsey@pwrfl-law.com Attorneys for Plaintiff | <input checked="" type="checkbox"/> by ECF Court efilng Application to the the extent counsel is registered <input checked="" type="checkbox"/> by Electronic Mail: <input type="checkbox"/> by Facsimile Transmission <input type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery |

DATED this 1st day of April, 2025, at Seattle, WA.

/s/ Will Cummins
Will Cummins, Legal Assistant